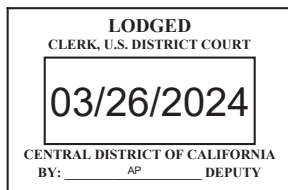


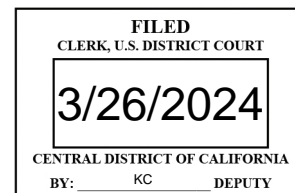
AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

☐ Original ☐ Duplicate Original

## UNITED STATES DISTRICT COURT

for the

Central District of California



UNITED STATES OF AMERICA,

v.

DONAL JAMES SEAVER,

Defendant.

Case No. 5:24-mj-00135

**CRIMINAL COMPLAINT BY TELEPHONE  
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of March 7, 2024 in the county of San Bernardino in the Central District of California, the defendant violated:

*Code Section*

18 U.S.C. §§ 2252A(a)(5)(B), (b)(2)

*Offense Description*

Possession of Child Pornography

This criminal complaint is based on these facts:

*Please see attached affidavit.*

☒ Continued on the attached sheet.

/s/

\_\_\_\_\_  
*Complainant's signature*

\_\_\_\_\_  
FBI Special Agent, Brian J. Diaz

\_\_\_\_\_  
*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: March 26, 2024

\_\_\_\_\_  
*Judge's signature*

City and state: Riverside, California

\_\_\_\_\_  
Honorable Sheri Pym, U.S. Magistrate Judge

\_\_\_\_\_  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Brian J. Diaz, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of a criminal complaint against Donal James SEAYER ("SEAYER"), for a violation of Title 18, United States Code, Section 2252A(a)(5)(B), (b)(2) (Possession of Child Pornography) (the "SUBJECT OFFENSE").

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only.

**II. BACKGROUND OF AFFIANT**

3. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI") and am presently assigned to FBI's Los Angeles Division, where I focus on violent crimes and gangs. I have been a Special Agent since September 2021. I completed the 21-week Basic Field Training Course in Quantico, Virginia, which included training from the FBI regarding computer technology, computer fraud, white collar crime, violent crime, interviewing and interrogation techniques, and arrest and search warrant procedures. Prior to joining the FBI, I was a military

policeman in the United States Marine Corps for five years. My education includes a bachelor's degree in criminology from Florida State University.

### **III. SUMMARY OF PROBABLE CAUSE**

4. On March 7, 2024, FBI and San Bernardino County Sheriff's Department ("SBCSD") executed a search warrant at SEAYER's residence in Hesperia, California, as part of FBI's ongoing investigation into individuals trading child pornography<sup>1</sup> online. FBI seized a Samsung Tablet from SEAYER that contained approximately over 10,000 images and 13 videos of child pornography. The tablet's historical device data show that it was frequently wiped via factory reset, which deleted all data on the device, and had been most recently reset on February 27, 2024.

5. As of March 7, 2024, SEAYER was employed as a school bus driver for First Student, Inc., and drove a route involving 10 elementary school students with special needs.

### **IV. STATEMENT OF PROBABLE CAUSE**

6. Based on my review of law enforcement reports, conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

#### **A. Background of the Investigation—FBI Arrests Munson**

7. On or around August 2023, FBI Albany arrested Benjamin Munson ("MUNSON") for violations of 18 U.S.C. § 2252A, involving the Receipt, Distribution and Possession of Child Pornography.

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<sup>1</sup> "Child pornography," "minor," and "sexually explicit conduct," are defined as set forth in Title 18, United States Code, Section 2256.

MUNSON consented to the FBI = assuming his online Wickr<sup>2</sup> and Session<sup>3</sup> identity where MUNSON broad access to a network of child pornography trading groups.

8. After taking over MUNSON's Wickr and Session accounts, an FBI Online Covert Employee (hereinafter "OCE"), observed that MUNSON had access to several child pornography trading groups. Each group operated in a similar manner. Individuals who were interested in participating in a child pornography trading network were vetted (see description below of requirements for entering these groups) in a stand-alone room before joining the main network.

9. A moderator of the network would place the interested child pornography trader into a stand-alone vetting room whereby instructions were posted in the room for the interested trader to post a certain number of hard-core child pornography media files. Once the interested trader posted the appropriate type and amount of material, that trader would be removed from the vetting room by the moderator and placed into a main child pornography trading room.

10. Once in the main room, participants would trade child pornography within the room. Many rooms had save features whereby the child pornography could be saved to the room. Therefore, any time a new trader would join the room, the new

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<sup>2</sup> Wickr is an end-to-end encrypted instant messaging application.

<sup>3</sup> Session is a cross-platform end-to-end encrypted instant messaging application emphasizing user confidentiality and anonymity.

trader had access to a large repository of child pornography. Many rooms have thousands of child pornography files saved to the repository.

11. Beyond the main room were several other rooms that branched off from the main room. The other rooms were delineated by the type of child pornography that the specific room was meant to cater to. To gain access to one of the specific rooms, a child pornography trader would have to post child pornography matching the room description within the main room, then a moderator would add them to the specific room. For example, a child pornography trader who was vetted into the main room would post a child pornography media file depicting a 4-year-old minor female, and then would cite the room name that was dedicated to child pornography depicting females, aged 0-6 years old.

**B. FBI Investigates "Crackmonkey737" on Wickr**

12. The FBI OCE observed a particular user who went by the username "Crackmonkey737". "Crackmonkey737" is a member of two themed groups. As a result, "Crackmonkey737" has access to thousands of child pornography media files in the file repositories as well as a daily stream of child pornography in each group. Furthermore, "Crackmonkey737" has stated in a conversation with other users in these groups that he is a moderator of his own set of child pornography trading rooms on Wickr that are closely vetted, but to which the FBI OCE does not have access.

**C. FBI Arrests Young and Investigates "Nudco"**

13. On or about September 1, 2023, FBI Honolulu arrested Casey Young ("YOUNG") following a non-custodial interview in which YOUNG confessed to being "Crackmonkey737" on Wickr. FBI Honolulu reviewed YOUNG's cellphone, which showed a Session conversation with another user "Nudco". The profile photo for the "Nudco" account is that of an approximately 6-8 year old girl posing with her breast and vagina exposed.

14. In the beginning of the conversation, YOUNG stated "From Wickr" in a message to "Nudco," which is a common way for users to establish how they know each other from other applications. "Nudco" responded stating, ". . . Wickr is slowly dieing."

15. In the conversation, YOUNG sent "Nudco" Child Sexual Abuse Material (hereinafter "CSAM") images of young girls swimming naked in a pool. This prompted "Nudco" to start talking about a hot tub. "Nudco" stated "I have a hot tub. I had to drain it when the kids were here." YOUNG asked if "Nudco" had kids and "Nudco" stated "Roommates kids." YOUNG asked if "Nudco" ever played with the kids and "Nudco" stated, "Yes. The 5yo would stay with me and he had wandering hands." YOUNG asked if the roommate was okay with this activity and "Nudco" stated "She didn't care." "Nudco" later clarified, "She would be gone for the weekend and I would have him." "She never knew what we were doing." "I don't think she would care." "Any pictures of your daughter". "Nudco" then sent two images of a boy, approximately five years old, clothed, and posing for

pictures. The same boy is depicted in both pictures but seemingly at different times.

**D. FBI Identifies "Nudco" as SEAVER**

16. To identify "Nudco," FBI Honolulu sent an administrative subpoena to Wickr for push tokens associated with several Wickr accounts. Push tokens are a unique anonymous identifier generated by a user's device (Apple (iOS) or Google (Android)) and sent to Wickr to identify where to send each recipient's notification. A push notification is a pop-up notification that announces instant messages and news update on a device. If a device doesn't have a push token, there is no way to send a push notification to it. Push tokens are generated by push service providers and are device specific.

17. Wickr responded to the administrative subpoena with the push tokens for the requested accounts, and the push tokens resolved to android devices, and therefore, to Google, LLC.

18. On or about September 19, 2023, FBI Honolulu sent a 2703(d) order to Google requesting information associated with the push tokens provided by Amazon.<sup>4</sup>

19. On or about September 20, 2023, FBI Honolulu downloaded data production pursuant to the 2703(d) order. The email associated with the push tokens used by Wickr user "Nudco" was "route62sb@gmail.com." The name was simply listed as "Tim". The following was also included:

Created on: 2023-08-09 19:09:33 Z

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<sup>4</sup> Amazon Web Services acquired Wickr as of June 24, 2021.

Terms of Service IP<sup>5</sup>:

2600:1012:b102:c48a:2109:ef00:6a05:255e

Term of Service Language: en

Birthday (Month Day, Year): April 20, 1995

20. On or about September 20, 2023, FBI Honolulu sent an administrative subpoena to Verizon for the Terms of Service IP address: 2600:1012:b102:c48a:2109:ef00:6a05:255e.

a. On September 29, 2023, Verizon responded with the following information included:

Name: Donal Seaver

Address: 10642 Redlands Ave, Hesperia, CA

Phone: 4423164530

21. Open-source research for "Donal Seaver" revealed a Facebook with URL [facebook.com/profile.php?id=100069661009573](https://facebook.com/profile.php?id=100069661009573) with display name "Donal Seaver (Chevy)." The Facebook profile indicated SEAVAR lives in Hesperia, California. The Facebook profile also indicated SEAVAR might have worked as a school bus driver for First Student.

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<sup>5</sup> IP stands for Internet Protocol address and refers to a unique number used by a computer or other digital device to access the Internet. Every computer or device accessing the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer or device may be directed properly from its source to its destination. Most Internet Service Providers ("ISPs") control a range of IP addresses. IP addresses can be "dynamic," meaning that the ISP assigns a different unique number to a computer or device every time it accesses the Internet. IP addresses might also be "static," if an ISP assigns a user's computer a particular IP address that is used each time the computer accesses the Internet. ISPs typically maintain logs of the subscribers to whom IP addresses are assigned on particular dates and times.



22. A review of the public posts on the Facebook page showed a post from October 25, 2022, which stated "2 Good dogs and a little brat". The post included a picture of two dogs, and a young boy who resembles the boy in the photo sent to the Crackmonkey737 account. Further review of SEEVER's Facebook page revealed a post from December 24, 2022. On this post, SEEVER commented "after I get rid of the roommates I will be down the hill to see my friends." "Have a happy and safe Christmas."

23. Public source queries for residents at 10642 Redlands Ave, Hesperia, CA 92345 (hereinafter "SUBJECT RESIDENCE") revealed the following other possible occupants:

- Individual 1, Date of birth (DOB): xx/xx/1992<sup>6</sup>
- Individual 2, DOB: xx/xx/1996
- Individual 3, DOB: xx/xx/1994
- Individual 4, DOB: xx/xx/1991

24. On or about October 11, 2023, I received a lead from FBI Honolulu regarding SEEVER. The lead contained all information thus far of the identity of SEEVER and his current location.

25. On or about November 30, 2023, I received the Session chats between SEEVER and YOUNG. I reviewed the images that SEEVER received from YOUNG via the Session chat. After reviewing the images, I was able to observe that SEEVER received multiple images of nude minor girls and boys from YOUNG.

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<sup>6</sup> The full birthdate of these individuals are known to law enforcement but are redacted here for privacy reasons.

a. One image in particular depicted a prepubescent boy holding his penis in his hand and a white substance, consistent with semen, was coming out of his penis.

26. On or about December 1, 2023, I conducted law enforcement records checks for SEAYER, such as a vehicle registration and driver's license information. Law enforcement records checks also identified the SUBJECT RESIDENCE location to be SEAYER's residence.

**E. Physical Surveillance of SEAYER's Residence**

27. On or about December 4, 2023, I conducted physical surveillance at the SUBJECT RESIDENCE. During the surveillance, I observed a white GMC pick-up truck and a Nissan Sedan parked at the residence. Law enforcement records checks returned the vehicles registered to SEAYER. On the same date, I requested Employment Development Department ("EDD") records checks for SEAYER.

**F. SEAYER Employed as a School Bus Driver**

28. On or about December 7, 2023, I received the results of the EDD records check. EDD results showed that SEAYER was currently employed at "First Student Management LLC." First Student Management LLC is a school bus service.

29. On or about February 26, 2024, FBI Victorville assisted SBCSD in conducting physical surveillance of SEAYER's residence at the SUBJECT RESIDENCE, and his place of employment at First Student Inc, located at 12393 Locust Ave, Victorville, CA. Law enforcement officers were saw SEAYER driving school bus "V89." Law enforcement officers saw SEAYER dropping off school

bus V89 at First Student Inc. Law enforcement Officers then saw SEEVER enter a white Honda Civic, with an Arizona license plate. Law enforcement records checks showed that the Honda Civic was registered to SEEVER, with an Arizona address. Law enforcement officers observed saw SEEVER drive from his place of employment to the SUBJECT RESIDENCE.

**G. State Search Warrant Executed at SEEVER's Residence**

30. On March 7, 2024, FBI Victorville assisted San Bernardino County Sheriff's Department ("SBCSD") in executing a California state search warrant for the SUBJECT RESIDENCE. At approximately 5:45 a.m., SEEVER departed the SUBJECT RESIDENCE. SEEVER was stopped by a marked SBCSD unit and was temporarily detained inside the marked SBCSD marked unit while law enforcement officers searched the SUBJECT RESIDENCE.

**H. Child Pornography located on a Samsung Table**

31. Law enforcement seized a Samsung Tablet SM-P610 ("Samsung Tablet") during the execution of the search warrant. This tablet was located in SEEVER's bedroom where he sleeps. SEEVER lived by himself at the time of the search warrant execution and stated that he has been living by himself since his roommates left the SUBJECT RESIDENCE sometime last year (2023).

a. On March 18, 2024, SA B. Guerra and SBCSD Detective K. Merrill spoke by phone with SEEVER's previous roommates, Individual 2 and 3. They confirmed that SEEVER had a lock on his bedroom door, and they saw SEEVER regularly lock his bedroom door with a key each time before SEEVER left for work.

They confirmed that they and their children only entered SEEVER's bedroom only when SEEVER was present and accompanied them into his bedroom.

32. With a digital forensics warrant, the San Bernardino County Sheriff's Department forensically imaged the Samsung Tablet using the forensic imaging software Cellbrite. Upon completion of the forensic imaging of the device, a Cellbrite imaging report was produced for the device. The Cellbrite imaging report is served to reveal all of the content found within the forensically imaged device; it serves as a mirror for the user to view all of the content within the device in a user-friendly readable format. I and SA B. Guerra conducted a review of the Cellbrite imaging report for the Samsung Tablet.

33. The name associated with the Samsung Tablet was "Tim" and the email address route62sb@gmail.com was associated with the Samsung Tablet.

a. The name of "Tim" and the email address of "route62sb@gmail.com" were the same name and email address provided by Google in response to an earlier 2703(d) order obtained by FBI Honolulu.

b. The PIN code for the Samsung Tablet was located on the Notes app on SEEVER's personal iPhone.

34. The Cellbrite imaging report of the Samsung Tablet revealed that SEEVER possessed child pornography in image and video format, written communications to and from SEEVER seeking to receive, distribute, and trade child pornography.

35. I did not locate the Session chat between SEAVAR and Young on the Samsung Tablet which was found on YOUNG's cellphone at the time of his arrest in September 2023. But the Cellbrite imaging report also showed that the Samsung Tablet was subject to frequent and recurring factory reset, which would essentially erase and wipe data contained in the Samsung Tablet. The Samsung Tablet had been most recently reset on February 27, 2024. The chat between SEAVAR and YOUNG occurred before that most-recent reset date of February 27, 2024.

**I. Sample Child Pornography Images**

36. A total of 10,815 suspected child pornography images were found in the Samsung Tablet. Out of those 10,815 images, a large percentage of images depicted prepubescent female vaginas, prepubescent male genitals to include penis and testicles, nude children appearing under 10 years old engaged in different types of sexual intercourse. There were also images of nude children in bondage bounded by their arms, hands and legs with rope. Images included screenshots of messages and profile accounts from file-sharing platforms such as Telegram<sup>7</sup> and MEGA<sup>8</sup>.

37. Image titled "3255595018761847247.0," dated March 06, 2024 6:31:46 PM (UTC +0), is a picture of a naked female child being vaginally penetrated by a naked, White male child, with his prepubescent penis exposed.

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<sup>7</sup> Telegram is a popular encrypted instant messaging platform.

<sup>8</sup> MEGA is a New Zealand-based encrypted file-hosting service.

38. Image titled "1470424470851372760.0" dated March 07, 2024, time 5:12:35 PM (UTC +0), is a picture of a female child appearing about 6 years old. The female child has her mouth open with an adult, male's testicle inside her mouth while simultaneously holding the adult male's erect penis with her left hand. The female child looks towards the camera.

39. Image titled "1881717015043456599.0" dated March 07, 2024, time 5:12:35 PM (UTC +0), is a picture of a nude female child appearing about 5 years old. The female child has an adult, male's erect penis inside her mouth. Simultaneously, the female child is using both hands to hold the erect penis.

40. Image titled "6052973534709398063\_109.jpg" dated March 6, 2024, time 07:08:08 PM (UTC +0), is a screenshot picture of a collage of 18 videos depicting child pornography. The screenshot of the video collage show naked Asian children engaged in performing oral sex, being manually stimulated and a naked child bounded by his hands and feet with blue rope.

41. Image titled "6053322986133502435" dated March 6, 2024, time 07:08:08 PM (UTC +0), is a screenshot picture of a collage of 18 videos depicting child pornography. One video cover shows a person bounded by their hands with rope. Another video cover reveals a video time stamped 01 minute and 51 seconds and of an adult male appearing about 30 years old performing oral sex on a nude prepubescent male appearing about 8 years old. I recognized the video cover as the same video found in SEAVAR's video folder of the device.

42. Image titled "6289833095523844211\_121.jpg" dated March 6, 2024, time 06:51:24 PM (UTC +0) is a screenshot of a profile indicative of proposing to trade child pornography. Within the screenshot, the following information is shown: email address "xxxxx@gmail.com"<sup>9</sup> joined on "2023-01-16" with user info: "I need some help, email me if you can help me and i'll give you all my collection"<sup>10</sup>...thank's"

#### **J. Sample of Child Pornography Videos**

43. The Samsung Tablet's "video" file contained 30 videos in total. Of the 30 videos, 13 were found to be videos of child pornography. The videos of child pornography depict children appearing as young as 6 years old engaging in different types of sexual intercourse and activities by themselves, with other children and/or with males appearing to be adults, and bestiality. The nature of sexual activities include, but are not limited to, penis-vaginal penetration, oral copulation, and digital penetration.

44. Video file titled 117b0b50-d6e7-11ee-8809-670ea4af96b3.mp4 dated March 5, 2024, time 12:00:37 PM (UTC +0), is a video of 11 minutes and 47 seconds. The video depicts a female child appearing to be about 8 years old. The video begins with the female child lying on her back on a bed with red, rose petal sheets. It appears as if someone is holding the

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<sup>9</sup> The full email address is known to law enforcement but is redacted here for privacy reasons and to protect an ongoing law enforcement investigation.

<sup>10</sup> "Collection" is a common term often used to refer to as having a possessed content of child pornography.

camera and that she is fully aware of being recorded because she directly looks towards the camera throughout the entirety of the video. The female child is initially only wearing a blue thong underwear and her breasts are exposed. The female child then removes her underwear exposing her prepubescent vagina. Her vagina is now fully exposed to the camera. The female child uses her fingers to spread and separate her outer vaginal labia (labia majora) and so is then exposing her clitoris, inner vaginal labia and vagina. The female child uses her fingers to rub her own vagina. The female child periodically pinches her own nipples. The female child flips onto her head, raises her buttocks in the air and spreads her buttocks to expose her anus. The female child regularly moves into multiple different position to continually expose her vagina and buttocks. The video appears as if a person was overtly recording the child and the camera is moved surrounding the bed as a means to record different angles of the child to capture the aforementioned sexual activities.

45. Video file titled "5\_6273783884614208678.mp4" dated March 6, 2024, time 07:02:49 PM (UTC +0), is a 5 minute and 7 second video. The video depicts a nude male child appearing to be about 8 years old. The male child is wearing a face mask covering his nose and mouth and has white, wired ear buds hanging from the side of the face mask. The male child appears to be sitting on a bench in a room appearing to be a kitchen. An adult male appearing between 20 to 30 years old then appears within the video. The adult male is seen tying a blue bandana



around his own face covering his eyes, nose and mouth. He is seen wearing a blue Adidas hat, has a silver, chain necklace and is only wearing clothing from the waist down exposing his bare chest. The adult male is seen performing oral sex on the male child and then proceeds to kiss the male child on the lips. The male child remains very still and does not seem to engage in kissing the adult male. After kissing the male child, the adult male then resumes performing oral sex on the male child for the remainder of the video. The video appears as if the recording camera was overtly placed in a position and angle to capture the entire aforementioned sexual activity.

46. Video file titled "5\_6328108718328121991.mp4" dated March 6, 2024, time 06:55:37 PM (UTC +0), is a 1 minute and 1 second video. The video depicts a nude male child appearing about 6 years old lying on his back on a bed with pink sheets. The male child's legs are spread open exposing his prepubescent penis and testicles. A nude, adult male appearing about 30 years old begins to perform oral sex on the male child. The video appears as if camera was overtly placed in a position and angle to capture the entire aforementioned sexual activity.

47. Video file titled "5\_6291742543038122697.mp4" dated March 6, 2024, time 07:05:20 PM (UTC +0), is a 11 minute and 39 second video. The video depicts two male children appearing to be about 8 years old. The male children are wearing shirts and no clothing from the waist below. Their prepubescent penises and testicles are seen in the video. The video depicts the male children performing oral sex on one another, anally penetrating

each other with their prepubescent penises and one child ultimately inserts a vibrating, cylindrical object into the secondary child's anus. The video appears as if a third person was holding the camera, recording the entire event and directing the children to engage in the aforementioned sexual activities.

48. Video file titled "5ba02930-da17-11ee-b6c9-dbe0ddd313fa.mp4" dated March 5, 2024, time 12:02:13 PM (UTC +0), is a 54 second video. The video depicts a female child appearing to be about 4 years old. The female child is wearing a pink crop top with no clothing from the waist below, exposing her prepubescent vagina in the video. The female child begins to stimulate an adult, male's erect penis until ejaculation. There is pubic hair all around the male's pelvis area and coarse hair surrounding his thighs, indicated that the male is postpubescent, likely an adult. The video appears as if the camera was overtly placed in a position and angle to capture the entire aforementioned sexual activity.

49. Video file titled "5bc42bf0-da17-11ee-b53a-73789485e43c.mp4" dated March 5, 2024, time 12:02:36 (UTC +0), is a 1 minute and 44 second video. The video depicts a female child appearing about 5 years old. The female child is wearing a yellow shirt with no clothing below the waist, exposing her prepubescent vagina in the video. The female child is laying on her back on a bed with blue sheets. Her legs are spread, exposing her clitoris and vagina. An adult, male's voice is heard in the video speaking a foreign language. An adult, White hand is seen giving the female child a thin, pink, penis-shaped

object, to which she puts in her mouth. Meanwhile, the adult male then holds his own erect penis to insert it into the female child's vagina. The adult, male hand is then seen taking the pink, penis-shaped object out of her mouth and begins to rub it in between her outer vaginal labia. The man then flips the child over, exposing her buttocks. The adult male then inserts his erect penis into the child's anus. The penis is seen with pubic hair indicating the male is postpubescent and likely an adult. The video appears as if the person that is recording and holding the camera the entire time is the same person engaged in the aforementioned sexual activity with the child.

50. Video file titled "7cdb33f0-d775-11ee-ab05-1bef136abf21.mp4" date March 1, 2024, time 02:49:00 (UTC +0), is a 1 minute and 41 second video. The video depicts a female child appearing about 9 years old is seen only wearing white underwear and her prepubescent breast are exposed. The female child appears to be in a bedroom with a male adult appearing between 20 to 30 years old. The male adult is naked with an erect penis. Both persons are standing facing one another. The female child is seen stimulating the erect penis with both of her hands. The adult male is seen rubbing the female child's breast. The video appears as if the recording camera was initially placed on a table but at this point in the video, then the adult male appears to grab the camera and hold it for the remaining of the video recording. It appears he is holding the camera near his mid-chest in which the angle for the remaining video reveals his mid-chest and below, his erect penis and the

physical entirety of the female child. The adult male is heard speaking English and saying statements to the effect of, "that feels really good. put your mouth on it." The child is heard saying "no" while she continues stimulating the erect penis with both of her hands. The adult male is heard saying statements to the effect of, "if you want. It'll feel really good. You can go faster. We're just playing a game." The female child is then seen pulling away and shaking her hands away while simultaneously saying "yuck." The adult male is heard saying a statement to the effect of, "hold it back on tight" to which the female child begins to use both hands to resume stimulating the erect penis. The adult male is heard saying a statement to the effect of "can I finish?" and then he proceeds to masturbate while simultaneously saying a statement to the effect of, "see, it's like that." His erect penis is pointed at the female child's prepubescent breast. The adult male is heard saying a statement to the effect of "here, do it like that. Try it out. You feel so good you sexy thing. I'm gonna squirt out your gummies. You ready?" The male then ejaculates onto the female's bare, prepubescent chest. The video appears as if the person that is recording and holding the camera the entire time is the same person engaged in the aforementioned sexual activity with the child.

51. Video file titled "aa819ab0-d775-11ee-8346-dfa2829cea09.mp4" date March 1, 2024, time 1:06:38 PM (UTC +0) is a 7 minute and 27 second video. The video depicts a female child appearing about 5 years old is only wearing underwear

exposing her prepubescent chest. She appears to be lying on a bed. An adult hand gives her a tablet with cartoon content. The female child is then positioned by the adult hand to lie on her back. The adult hand then removes the female child's underwear exposing her prepubescent vagina to the camera. The adult hand then spreads her legs and the camera zooms into her vagina. The adult is partly seen in the video resembling a adult male wearing a grey shirt. The adult male then turns the child over onto her stomach exposing her buttocks. The adult male then turns her back onto her back, exposes her vagina and begins to digitally penetrate her vagina with his finger. The finger appears to have a clear, jelly like substance on it. He continues to rub the female child's clitoris and vagina throughout the remainder of the video. The child regularly tries to move away and close her legs, but the adult male continually repositions her to place her back and spread her legs to continue rubbing her vagina. The child is also heard moaning as she kicks her legs away. Then the adult male's finger penetrates the child's anus. The video appears as if camera was overtly placed in a position and angle to capture the entire aforementioned sexual activity.

**K. SEEVER Sought to Trade Child Pornography With Like-Minded Individuals**

52. The following file-sharing and messaging internet-based platforms and device applications were found on the Samsung Tablet: Session, Telegram, MEGA and iMGSR<sup>11</sup>. From my

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<sup>11</sup> IMGSR is a Russian photo-sharing website.

experience and training as well as based on conversations with other law enforcement officers, these file-sharing and messaging platforms are commonly used among individuals engaged in trading, distributing and possessing child pornography because the platforms offer an encrypted, private and anonymous messaging service which is ideal for those engaged in criminal activity and intending to evade detection from law enforcement.

**a) Telegram**

53. Within the Telegram application, I found messaging activity ranged from February 29, 2024, to March 6, 2024. SEEVER's Telegram username was "Jim" with the associated account phone number 760-998-4355. There were total of 4 message threads with 4 different Telegram users. There were no message communications within the threads. The messages within the thread appeared to have been deleted. On February 29, 2024, time 06:03:20 PM (UTC +0), a message thread between SEEVER and Telegram user, "Individual A"<sup>12</sup> showed that the message thread was trashed. The indicated chat type was "broadcast."

54. On March 6, 2024, time 07:13:00 (UTC +0), a message thread between SEEVER and Telegram user "Individual B," showed that the message thread was deleted. The indicated chat type was "unknown."

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<sup>12</sup> This online account user and others are known to law enforcement and is a subject of an ongoing law enforcement investigation. Thus, this and other online account user names have been anonymized to preserve the integrity of ongoing investigation.

55. A third message thread between SEAYER and Telegram user "Individual C" showed no messages, and the indicated chat type was "OneonOne."

56. The fourth message thread between SEAYER and Telegram user "Individual D," showed no messages and the indicated chat type was "OneonOne."

57. Additionally, Image 351.jpg dated March 7, 2024, time 4:55:47 PM (UTC +0) found within the "image" folder of the device was a screenshot of the Telegram application showing SEAYER's contacts and unread messages. Unread messages were from Telegram users "Individual C" and "Individual D." The unread message from "Individual C" was sent at 4:36 PM with the preview message: "Yeah I know." The unread message from "Individual D" sent at 2:09 AM with preview message: "[envelope emoji] [black circle emoji] GIRL [black circle emoji] BOY [black circle emoji] RAP..." The remainder of the message was unable to be seen from the screenshot. The screenshot image is indicative that SEAYER engaged in activity on Telegram which is commonly used to receive, distribute and trade child pornography.

**b) Session**

58. Within the Session application, I found messaging activity ranged from February 24, 2024, to March 6, 2024. SEAYER's Session username was "Kinderphoto." The Gmail "kinderphoto2@gmail.com" was found within the device indicating that SEAYER was the Session user as "Kinderphoto." There were a total of 9 message threads with 9 different Session users. There were a total of 81 messages found within the application.

SEAVER initiated most of the Session message threads by indicating he saw them on iMGSRG.

59. SEAVER messaged Session user "Individual E." The settings on the app show that SEAVER set the messaging thread to disappear messages at 3600 seconds. Their conversation is in German and both SEAVER and the Session user discuss what age and gender they like children. SEAVER engages in "fantasy talk" about how he "has fun" with twin 7-year-old children and a 10-year-old girl. The following messages were written by SEAVER and Session user "Individual E" and translated from German to English:

[MESSAGE THREAD BEGINS]

Message sent by: System  
Date: 02/24/2024 06:17:40 PM (UTC +0)  
Message: Message request accepted

Message sent by: System  
Date: 02/24/2024 10:05:11 PM (UTC +0)  
Message: Kinderphoto set disappearing message time to 3600 seconds

Message sent by: FNU LNU (Unknown Person): Individual E  
Date: 03/01/2024 1:06:24 AM (UTC +0)  
"Well, children up to eight always go [winking face with tongue sticking out emoji]"

Message sent by: FNU LNU (Unknown Person): Individual E  
Date: 03/01/2024 1:06:24 AM (UTC +0)  
"Both"

Message sent by: Kinderphoto  
Date: 03/01/2024 1:06:29 AM (UTC +0)  
"Hello, I saw you on imgsrg. What are you interested in?"

Message sent by: Kinderphoto  
Date: 03/01/2024 1:06:29 AM (UTC +0)  
"I like children from 5/12. no hair"



Message sent by: Kinderphoto  
Date: 03/01/2024 1:06:29 AM (UTC +0)  
"Boys and girls?"

Message sent by: Kinderphoto  
Date: 03/01/2024 1:06:29 AM (UTC +0)  
"My roommate has 7 year old twins and a 10 year old girl.  
it's a lot of fun to play with"

[MESSAGE THREAD ENDS]

60. SEAVAR messaged Session user "Individual F." The message conversation between SEAVAR and "Individual F" discuss how they like to spy on their minor-age children "playing" with themselves. In part of the message thread:

[MESSAGE THREAD CONTINUED]

Message sent by: Kinderphoto  
Date: 03/06/2024 10:39:32 AM (UTC +0)  
Message: "Twins are 6 and my stepson is 8"

Message sent by: Individual F  
Date: 03/06/2024 11:40:41 AM (UTC +0)  
Message: "I like them from 10 but i think is a risky Time for you being alone with the Twins"

[MESSAGE THREAD CONTINUED]

Message sent by: Kinderphoto  
Date: 03/06/2024 11:09:04 AM (UTC +0)  
Message: "Very nice I have caught the girls playing with each other"

Message sent by: Individual F  
Date: 03/06/2024 11:13:40 AM (UTC +0)  
Message: "Fingering?"

Message sent by: Kinderphoto  
Date: 03/06/2024 11:14:58 AM (UTC +0)  
Message: "They were playing with a vibrator"

[MESSAGE CONTINUES]

Message sent by: Individual F  
Date: 03/06/2024 11:24:52 (UTC +0)

Message: "Did you choose her, playing with yours"

Message sent by: Kinderphoto

Date: 03/06/2024 11:26:01 AM (UTC +0)

Message: "Yes"

Message sent by: Individual F

Date: 03/06/2024 11:29:45 (UTC +0)

Message: "Show me your little slut"

Message sent by: Kinderphoto

Date: 03/06/2024 11:29:56 (UTC +0)

Message: "I don't have any pictures on this tablet [space break] I have some good stuff on my computer"

Message sent by: Individual F

Date: 03/06/2024 11:31:45 (UTC +0)

Message: "okay"

Message sent by: Kinderphoto

Date: 03/06/2024 11:32:55 (UTC +0)

Message: "I will load sessions on the computer today [space break] Do you have any pictures of your girl"

Message sent by: Individual F

Date: 03/06/2024 11:33:55 (UTC +0)

Message: "Oh yes, I did"

Message sent by: Kinderphoto

Date: 03/06/2024 11:34:37 (UTC +0)

Message: "Younger or when she was older"

Message sent by: Individual F

Date: 03/06/2024 11:38:23 (UTC +0)

Message: "both"

Message sent by: Kinderphoto

Date: 03/06/2024 11:38:24 (UTC +0)

Message: "Pictures or videos?"

Message sent by: Kinderphoto

Date: 03/06/2024 11:38:45 (UTC +0)

Message: "I mostly have videos"

Message sent by: Individual F

Date: 03/06/2024 11:39:20 (UTC +0)

Message: "Both"

Message sent by: Kinderphoto  
Date: 03/06/2024 11:42:58 (UTC +0)  
Message: "I have a couple of the girls bent over and (Ben their brother) standing behind them with a boner"

**c) MEGA**

61. Within the MEGA application, I found messaging activity on March 6, 2024. SEAVAR's MEGA username was "Kinderphoto." There was one message thread with one MEGA user, "Individual G." SEAVAR initiated the message communication. The message thread appeared to be deleted. The following messages were found within the thread:

[MESSAGE THREAD BEGINS]

Message sent by: Kinderphoto  
Date: 03/06/2024 01:02:30 PM (UTC +0)  
Message: "Saw you on imgsrc. What age do you like? B or G"

Message sent by: System  
Date: 03/06/2024 08:39:18 (UTC +0)  
Message: "Individual G cleared the chat history" [Trash can emoji]

[MESSAGE THREAD ENDS]

62. Additionally, Image titled "2688897255780709.0" dated March 7, 2024, time 5:06:55 PM (UTC +0), Screenshot of "Create your MEGA account" with the section box for 'first name' filled in as "Kinder," 'last name' section box filled in as "Photo," 'email address' section box filled in as "kinderphoto2@gmail.com and 'Password' section box filled in as "6863EIC@jon."

**d) Gmail**

63. Within the Google email application, I found emails and messaging activity ranged from March 4, 2024 - March 7,

2024. SEAVER's Google email (Gmail) was "kinderphoto2@gmail.com." There were a total of 19 outgoing and incoming emails. Twelve emails were sent by SEAVER to 12 different email accounts. SEAVER labeled the subject header "Imgsrsrc" in all of the 12 emails and emails' message body all had the statement to the effect of "Do you have sessions or TeleGuard?"

64. Seven emails are message conversations between SEAVER and "Individual I." The subject header is "Pix." The email thread begins on March 7, 2024, time 08:50:17 AM by SEAVER emailing "Individual I." The messages found between SEAVER and "Individual I" are as follows:

[EMAIL THREAD BEGINS]

Message sent by: Kinderphoto <kinderphoto2@gmail.com>  
Date: 03/07/2024 08:50:17 AM (UTC +0)  
Message: "Did you find any pictures of your girls?"

Message sent by: Individual I  
Date: 03/07/2024 09:23:51 AM (UTC +0)  
Message: "Hi, I must work this night, not at home yet, but when i am home i sent, i am in hotel to Friday"

Message sent by: Kinderphoto <kinderphoto2@gmail.com>  
Date: 03/07/2024 09:26:30 AM (UTC +0)  
Message: "Ok, have fun!"

Message sent by: Individual I  
Date: 03/07/2024 09:35:36 AM (UTC +0)  
Message: "Thanks, i love your twin daughters, they are very beautiful"

Message sent by: Kinderphoto <kinderphoto2@gmail.com>  
Date: 03/07/2024 09:39:20 AM (UTC +0)  
Message: "I'm glad you like them"

Message sent by: Individual I  
Date: 03/07/2024 09:41:06 AM (UTC +0)

Message: "Yes i do very much"

Message sent by: Kinderphoto <kinderphoto2@gmail.com>

Date: 03/07/2024 10:03:45 AM (UTC +0)

Message: "How big plug you can put in their pussys"

[END OF EMAIL THREAD]

65. Additionally, a picture was found in the SEEVER's device's "image folder" revealed the image dated March 7 =,2024, time 09:50:07 AM (UTC +0), was a screenshot of his Gmail Primary inbox. An email timestamped 1:35 AM, subject header "Pix," message body "I'm glad you like them," sender and receive is SEEVER and "Rxxxxx." The message thread indicates numerically 5 messages are within the email thread. The in-part message, subject header and email receiver as seen on the screenshot appear to be the email content SEEVER held with "Individual I."

**L. SEEVER Did Frequent Factory Reset to Wipe His Device**

66. SEEVER's historical data device revealed that 20 factory reset wipes were made beginning July 10, 2023 to February 27, 2024. The last factory reset wipe occurred on February 27, 2024, at 06:57:55 PM. The factory reset wipes appeared to reoccur an average of four times a month. Factory reset wipes on devices is a common practice among individuals engaged and/or eliciting in child pornography to erase evidence of their criminal activity and evade the detection of law enforcement.

**M. SEEVER's Statement about His Employment as a School Bus Driver**

67. During an interview with SEEVER, he stated that he is currently employed as a school bus driver for First Student

Inc., where he drives a school bus for kids with special needs. SEAVAR stated he has an Arizona driver's license and license plates because he travels to Arizona almost every weekend. SEAVAR stated that having a California license plate in Arizona makes it more likely for law enforcement to pull him over.

68. SEAVAR stated that as a school bus driver, his assigned route was "route 62." SEAVAR stated that "route 62" meant that he drives special needs children that require a higher level of care. SEAVAR stated that the school bus routes are numerically organized to indicate the level of special needs children and their required level of care as they ride the school bus. The numerical school bus routes ranged from approximately 0 to approximately 80; the higher the numerical bus route indicated the higher level of care and special needs children who rode the assigned school bus routes. SEAVAR stated that because his assigned numerical bus route was "route 62," it meant that he drives children with special needs requiring a significantly higher level of care. SEAVAR stated he drove about 10 elementary school children with special needs to and from school on his assigned numerical bus route, "route 62."

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**V. CONCLUSION**

69. For all the reasons described above, there is probable cause to believe that SEAVER has committed a violation of the SUBJECT OFFENSE, namely, Title 18, United States Code, Section 2252A(a)(5)(B), (b)(2) (Possession of Child Pornography).

Attested to by the applicant in  
accordance with the requirements  
of Fed. R. Crim. P. 4.1 by  
telephone on this 26th day of  
March 2024.



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HONORABLE SHERI PYM  
UNITED STATES MAGISTRATE JUDGE